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January 5, 2023

**VIA ECF**

Hon Katherine Polk Failla, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**MEMO ENDORSED**

**Re: 622 Third Avenue Company, L.L.C. v. National Fire Insurance  
Company of Hartford, Travelers Property Casualty Company  
of America, and Harleysville Worcester Insurance Company  
Docket No. : 21-CV-6050 (KPF)**

Dear Judge Failla:

We represent defendant NATIONAL FIRE INSURANCE COMPANY OF HARTFORD (“Hartford”) in the above-referenced matter. I submit this letter pursuant to your Honor’s Individual Rules of Practice 2.C. and 2.D., to request a short extension of time for the parties to submit a joint letter concerning next steps in this case until **January 20, 2023**.

Pursuant to your Honor’s Opinion and Order dated and entered December 16, 2022 (the “Order”), plaintiff’s motion for partial summary judgment was granted and Hartford’s and defendant TRAVELERS PROPERTY CASUALTY COMPANY OF AMERICA’s (“Travelers”) cross-motions were denied. In the Order, your Honor also directed the parties to submit a joint letter to the Court proposing next steps in this case by January 6, 2023. Due to our respective schedules, I have not been able to discuss the Order with my client, and will not be able to do so until he returns to the office on January 10. All counsel are scheduling a telephone conference to take place soon thereafter, which would allow the parties to submit the joint letter on or before January 20.

Counsel for all parties consent to this request.

Respectfully Submitted,

David R. Shyer

Cc: All counsel via ECF

Application GRANTED.

The Clerk of Court is directed to terminate the pending motion at docket entry 75.

Dated: January 5, 2023  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE